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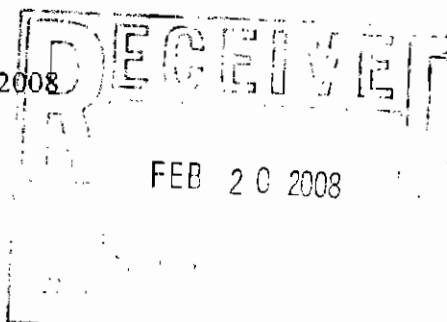
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ERIC W. SIEGLE

February 20, 2008



JONATHAN D. SIMS

VIA FACSIMILE

United States District Court
Southern District of New York
500 Pearl Street, Room 1310
New York, New York 10007
Attn.: Michael H. Dolinger, U.S.M.J.

Re: Zhao v. City of New York et al.
07CV.3636 (LAK)(MHD)

Dear Honorable Judge Dolinger:

We represent plaintiff in the above-referenced matter. We write to respectfully request that the Court allow us one day to reply to defendant's response to our February 15, 2008 and February 18, 2008 applications.

Further, we wish to correct a material mis-statement by defendants' counsel in his February 19, 2008 application for an enlargement of time which ultimately may bear on the resolution of the deposition schedule herein. Counsel states that he will not be available for depositions "on the dates proposed by plaintiff." As indicated in our February 15, 2008, application, the dates were proposed unilaterally by defendants' counsel. See attached email from Mr. Graziadei, dated February 11, 2008. Further, assistant corporation counsel Jennifer Rossan, who has been working with Mr. Graziadei on this matter since at least December, 2007, was carbon copied on this email, and is presumably still employed by Corporation Counsel and available to conduct depositions. In addition, Mr. Graziadei specifically requested that we include Ms. Rossan on all email correspondence, as he stated that discovery matters would impact her schedule. It should be noted that we cleared our calendars on the dates proposed by defendants' counsel, and sought endorsement of the proposed schedule, only after defendants refused to respond to our requests to schedule individual witnesses on each of the dates defendants proposed, in violation of this Court's January 31, 2008 Order.

ENDORSED ORDER

With defendants' response due on Feb 22, 2008,
plaintiff may reply by Feb. 25, 2008.

[Signature]
2/20/08

We thank the Court for its consideration of these matters.

Respectfully submitted,

SIEGLE & SIMS L.L.P.

A handwritten signature in black ink, appearing to read "Jonathan D. Sims", written in a cursive style.

Jonathan D. Sims

Attach.

cc: John H. Graziadei, A.C.C. (via facsimile)

Jennifer Rossan, A.C.C. (via facsimile)

SIEGLE & SIMS L.L.P.